

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In Re:	: Bankruptcy No. 20-12319-ELF
Melinda V. Stanfield	: Chapter 13
Debtor	:
	:
CSMC 2019-RPL4 Trust c/o Select Portfolio	:
Servicing, Inc.	:
Movant	:
vs.	:
Melinda V. Stanfield	:
Debtor/Respondent	:
and	:
William C. Miller, Esquire	:
Trustee/Respondent	:

**OBJECTION TO CONFIRMATION OF THE PLAN**

CSMC 2019-RPL4 Trust c/o Select Portfolio Servicing, Inc. (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Chapter 13 Plan of Debtor, Melinda V. Stanfield (“Debtor”), as follows:

1. As of the bankruptcy filing date of 05/15/2020, Movant holds a secured Claim against the Debtor’s property located at 6906 Paschall Avenue, Philadelphia, PA 19142.
2. On July 22, 2020, Movant filed a Proof of Claim citing a total secured claim in the amount of \$73,927.42, and an interest rate of 8.89%.
3. The Plan proposes to pay a total claim of \$74,512.00 with an interest rate of 6.00%.
4. The Plan fails to cure the delinquency pursuant to 11 U.S.C. § 1322(b)(5).
5. The Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim.

6. Movant objects to the feasibility of the Plan under 11 U.S.C. § 1325(a)(6). The Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Chapter 13 Plan.

Dated: 07/22/2020

Respectfully submitted,

/s/ Stephen M. Hladik, Esquire  
Stephen M. Hladik, Esquire  
Hladik, Onorato & Federman, LLP  
Attorney I.D. # 66287  
298 Wissahickon Avenue  
North Wales, PA 19454  
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William C. Miller, Esquire	:
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**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED  
PLAN TO PARTIES IN INTEREST**

I, Stephen M. Hladik, Esquire, attorney for CSMC 2019-RPL4 Trust c/o Select Portfolio Servicing, Inc. ("Movant"), certify that I served a copy of the attached Objection to the Plan to the parties below on 07/22/2020:

Brad J. Sadek, Jr., Esquire  
Via Electronic Filing  
*Attorney for Debtor*

William C. Miller, Esquire  
Via Electronic Filing  
*Trustee*

Melinda V. Stanfield  
6906 Paschal Avenue  
Philadelphia, PA 19142  
Via First Class Mail  
*Debtor*

Respectfully Submitted,

Date: 07/22/2020

/s/ Stephen M. Hladik, Esquire  
Stephen M. Hladik, Esquire  
Hladik, Onorato & Federman, LLP  
Attorney I.D. # 66287  
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